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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Trevor Kevin Baylis

Plaintiff(s),

v.
Valve Corporation, also known as,
Valve Software

Defendant(s).

CASE NO. 2:23-cv-01653-RSM
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: Yes No

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Trevor Kevin Baylis
Street Address	Jankaraitti 10 A 4
City and County	Tampere
State and Zip Code	33560, FINLAND
Telephone Number	3587225899

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1 B. Defendant(s)

2 Provide the information below for each defendant named in the complaint, whether the
3 defendant is an individual, a government agency, an organization, or a corporation. For an
4 individual defendant, include the person's job or title (if known). Attach additional pages if
needed.

5 Defendant No. 1

Name	Valve Corporation (A.K.A Valve Software)
Job or Title (<i>if known</i>)	
Street Address	Floor 14, 10400 NE 4th St,
City and County	Bellevue WA,
State and Zip Code	Washington, 98004, USA
Telephone Number	(425) 889-9642

10 Defendant No. 2

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

16 Defendant No. 3

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

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1 Defendant No. 4

2 Name _____

3 Job or Title (*if known*) _____

4 Street Address _____

5 City and County _____

6 State and Zip Code _____

7 Telephone Number _____

II. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*select all that apply*)

Federal question:

If checked complete section A.

Diversity of citizenship:

If checked complete section B.

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States

Constitution that are at issue in this case. *Attach additional pages if needed.*



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1 B. If the Basis for Jurisdiction Is Diversity of Citizenship

2 1. The Plaintiff(s)

3 a. If the plaintiff is an individual.

4 The plaintiff (*name*) **Trevor Kevin Baylis**, is a citizen of the
5 State of (*name*) **United Kingdom (Domicile: Finland)**.

6 b. If the plaintiff is a corporation.

7 The plaintiff, (*name*), is incorporated under
8 the laws of the State of (*name*), and has its principal
9 place of business in the State of (*name*).

10 *(If more than one plaintiff is named in the complaint, attach an additional page providing
the same information for each additional plaintiff.)*

12 2. The Defendant(s)

13 a. If the defendant is an individual.

14 The defendant, (*name*), is a citizen of the
15 State of (*name*). Or is a citizen of
16 (*foreign nation*).

17 b. If the defendant is a corporation.

18 The defendant, (*name*) **Valve Corporation**, is incorporated under
19 the laws of the State of (*name*) **Washington (state)**, and has its principal
20 place of business in the State of (*name*) **Washington (state)**.

21 Or is incorporated under the laws of (*foreign nation*),
22 and has its principal place of business in (*name*).

23 *(If more than one defendant is named in the complaint, attach an additional page
providing the same information for each additional defendant.)*

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1 3. The Amount in Controversy.

2 The amount in controversy-the amount the plaintiff claims the defendant owes or the
3 amount at stake-is more than \$75,000, not counting interest and costs of court, because (*explain*)
Attach additional pages if needed:

4 1. Defendant owes at least \$1 096 451,5 actual damages based on information and belief to be the
5 amount of gross revenue generated though unauthorized distribution by Valve Corporation of plaintiffs
copyrighted works which is likely to go up over time as more revenue is generated by continued
infringement.

6 2. This figure is based on 'Revenue Sales Numbers, Boxleiter Method' to calculate gross revues from
7 user reviews submitted by customers paying Valve Corporation for use and access to the infringing
games.

8 **III. STATEMENT OF CLAIM**

9 *Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as
possible the facts showing that each plaintiff is entitled to the damages or other relief sought.
State how each defendant was involved and what each defendant did that caused the plaintiff
harm or violated the plaintiff's rights, including the dates and places of that involvement or
conduct. If more than one claim is asserted, number each claim and write a short and plain
statement of each claim in a separate paragraph. Attach additional pages if needed.*

10 3. Valve Corporation has distributed plaintiff's copyrighted works worldwide without authorization from
11 plaintiff via numerous games related to the film Iron Sky of which plaintiff is an author. In particular
Plaintiff created numerous 3D modeled space craft that appear prominently and feature as the main
game-play of the games being distributed. Film footage from Iron Sky also appears in the game
featuring plaintiff's copyrighted material.

12 4. Valve Corporation were sent a DMCA request to remove the games. However, Valve Corporation
continues to willfully infringe and monetize plaintiff's copyrighted material.

13 **IV. RELIEF**

14 *State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do
not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing
at the present time. Include the amounts of any actual damages claimed for the acts alleged and
the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts,
and the reasons you claim you are entitled to actual or punitive money damages. Attach
additional pages if needed.*

15 5. Plaintiff asks court to order Valve Corporation to pay them at least \$1 096 451,5 for actual damages
as this is believed to be gross revenue generated by infringing actions as of 4 October 2023.

16 6. Plaintiff asks court to order Valve Corporation to pay them further accruing actual damages from 4
October 2023 as the willful infringement is ongoing.

17 7. Plaintiff asks court to order Valve Corporation to cease their willfully infringing actions against Plaintiff.

18 **V. CERTIFICATION AND CLOSING**

19 Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my
20 knowledge, information, and belief that this complaint: (1) is not being presented for an improper
21 purpose; (2) includes a true statement of the parties' names and addresses; (3) complies with
22 the requirements of Rule 10; and (4) is not otherwise subject to dismissal under Rule 11.

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1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or
3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so
4 identified, will likely have evidentiary support after a reasonable opportunity for further
5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of
6 Rule 11.

7 I agree to provide the Clerk's Office with any changes to my address where case-related
8 papers may be served. I understand that my failure to keep a current address on file with the
9 Clerk's Office may result in the dismissal of my case.

10 Date of signing: 30th Oct 2023

11 Signature of Plaintiff Trevor Bay

12 Printed Name of Plaintiff TREVOR KEVIN BAYLIS

14 Date of signing: _____

15 Signature of Plaintiff _____

16 Printed Name of Plaintiff _____

18 Date of signing: _____

19 Signature of Plaintiff _____

20 Printed Name of Plaintiff _____